

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UMUOJI IMPROVEMENT UNION
(NORTH AMERICA), INC.

Plaintiff

v.

UMUOJI IMPROVEMENT UNION
(NORTH AMERICA), INC., UMUOJI
IMPROVEMENT UNION, MASSACHUSETTS,
INC., VICTOR IDE OKOYE and OGOR OKOYE

Defendants

VERIFIED COMPLAINT

I. INTRODUCTION

1. This is a trademark infringement action arising out the defendants' unlawful use of the plaintiff's name and services. As set forth in detail below, the defendants' willfully used, without consent, the plaintiff's name as a means of tarnishing the plaintiff's reputation, diluting the quality of the plaintiff's name and lessening the capacity of this name to identify and distinguish the plaintiff's services. The plaintiff brings claims for trade infringement and false designation of origin in violation of section 43(a) of the Lanham Act (15 U.S.C. § 1125(a)) (Count I), use of counterfeit marks in violation of Massachusetts General Laws c. 110h § 12 (Count II), fraud (Count III), unjust enrichment (Count IV), slander of business title (V) and tortious interference with contract (Count VI).

II. PARTIES

2. The plaintiff, Umuoji Improvement Union (North America), Inc. ("UIU"), is a non-profit corporation organized and existing under the laws of the State of Nebraska with a

principal place of business located at 6821 South Fork Circle, Lincoln, Nebraska.

3. Defendant Umuoji Improvement Union (North America), Inc. (“UIU Massachusetts - 1”), is a nonprofit corporation organized and existing under the laws of the Commonwealth of Massachusetts with a principal place of business located at 20 Central Avenue, Suite 512, Lynn, Massachusetts.

4. Defendant Umuoji Improvement Union, Massachusetts, Inc. (“UIU Massachusetts - 2”), is a nonprofit corporation organized and existing under the laws of the Commonwealth of Massachusetts with a principal place of business located at 38 Hilda Street, Worcester, Massachusetts.

5. Defendant Victor Ide-Okoye (“Ide-Okoye”) is a natural person with a last and usual residence located at 21 Orchard Avenue, Saugus, Massachusetts. Ide-Okoye is president of UIU Massachusetts - 1 and a director of UIU Massachusetts - 2.

6. Defendant Ogor Okoye (“Okoye”) is a natural person with a last and usual residence located at 21 Orchard Avenue, Saugus, Massachusetts. Okoye was an officer of UIU Massachusetts - 2 upon its inception in 2017.

III. JURISDICTION

7. This Court has jurisdiction over the subject matter and the defendants in this case pursuant to 28 U.S.C. §1331 (federal question jurisdiction) and 28 U.S.C. §1332 (federal diversity jurisdiction). This Court has supplemental jurisdiction over the state law claims because such claims are integrally and factually related to the federal claims and form part of the same case or controversy pursuant to 28 U.S.C. §1367.

IV. FACTS

8. UIU is a nonprofit corporation comprised of members of Umuoji descent who

seek to raise charitable funds to benefit the people of Umuoji, Nigeria.

9. UIU was registered as a non-profit organization in the state of Nebraska in 2009.

See Exhibit A, appended.

10. Ide-Okoye was elected president of UIU in July, 2017.

11. On or about November 18, 2018, Ide-Okoye was removed as president of the UIU due to allegations of impropriety, including that he embezzled UIU funds. A letter to the plaintiff notifying him of his removal as president of the UIU as well as a copy of the minutes of a meeting of the UIU board in which the plaintiff's removal is discussed are attached as Exhibit B and Exhibit C.

12. After his removal, Ide-Okoye, rather than seek to contest said removal or create his own separate organization, instead sought to create his own counterfeit organization. To that end, he used UIU's letterhead to create purported minutes from a meeting, which, upon information and belief, never took place. See Exhibit D, appended.

13. The first page of these purported minutes states:

UIUNA Inc. Domestication/Conversion/Registration to a New Domicile (Massachusetts) Since we have no branch or any presence in Nebraska. *To maintain our EIN number and report to the IRS on the organization's Form 990.* (emphasis added).

The second page of the purported minutes states:

Another resolution reached was Domestication/Conversation/Registration of our organization to a new Domicile (Massachusetts) and *closed the articles of incorporation in Nebraska.* (emphasis added).

14. Thereafter, Ide-Okoye created several counterfeit organizations in the Commonwealth of Massachusetts using the name of UIU, including UIU Massachusetts – 1 and UIU Massachusetts - 2, in which his wife, Okoye, was a founding officer. See Exhibit E and Exhibit F, appended, which are, respectively, business entity summaries from the Massachusetts

Secretary of State for UIU Massachusetts - 1 and UIU Massachusetts - 2.

15. Thus, Ide-Okoye never contested his removal from UIU in Nebraska nor did he seek to close the articles of incorporation in Nebraska, he simply created new counterfeit UIU organizations in Massachusetts and, upon information and belief, continued using UIU's IRS identification information.

16. These counterfeit organizations were created in order to confuse potential donors, business partners and, presumably, the IRS, as to the affiliation or connection of the defendants with UIU, which has resulted in UIU suffering damages.

17. Further, since creating these counterfeit organizations, Ide-Okoye has brought several personal lawsuits against individual members of the UIU, both in the Commonwealth of Massachusetts and the State of Texas. See Ide-Okoye v. Enweze et al., Essex County Superior Court (Newburyport), Docket No.: 1977CV00310 (plaintiff, Ide-Okoye, seeks damages for defamation against several members of UIU); Umuoji Improvement Union (North America), Inc. v. Pearl Oguchi, District Court, 268th Judicial District (Fort Bend), Docket No.: 19DCV25782 (plaintiff, UIU Massachusetts - 1, seeks tort damages against treasurer of UIU).

18. These lawsuits aver tortious conduct on the part of certain UIU members and the parties and issues presented in these lawsuits are distinct from the claims set forth herein.

COUNT I
TRADE INFRINGEMENT AND FALSE DESIGNATION OF ORIGIN
IN VIOLATION OF SECTION 43(A) OF THE LANHAM ACT
(15 U.S.C. § 1125(a))

19. All allegations set forth above are restated and realleged as if set forth in full herein.

20. Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a) provides, in relevant part, that:

Any person who, on or in connection with any goods or services, or any container for goods, uses in commerce any word, term, name, symbol, or device, or any combination thereof, or any false designation of origin, false or misleading description of fact, or false or misleading representation of fact, which—(1)(a) is likely to cause confusion, or to cause mistake, or to deceive as to the affiliation, connection, or association of such person with another person, or as to the origin, sponsorship, or approval of his or her goods, services, or commercial activities by another person . . . shall be liable in a civil action by any person who believes that he or she is or is likely to be damaged by such act.

21. Redress for trade infringement pursuant to the Lanham Act is available in circumstances, like here, where a plaintiff nonprofit sues a defendant nonprofit for using its name to compete for fundraising dollars. Valley Forge Military Academy Found. v. Valley Forge Old Guard, Inc., 24 F. Supp. 3d 451, 459 (E.D. Pa. 2014) (plaintiff nonprofit can pursue Lanham Act claim against defendant nonprofit that used plaintiff's name to compete for fundraisers).

22. By making unauthorized use of the UIU name the defendants have used a “false designation of origin” that is likely to cause confusion, mistake or deception as to the affiliation or connection of the defendants with UIU and as to the origin, sponsorship, association or approval of the defendants' services by UIU, in violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a).

23. The defendants' acts constitute the use of false designations of origin and false and/or misleading descriptions or representations, tending to misleadingly describe and/or represent the defendants' services as those of UIU, in violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a).

24. The defendants' wrongful acts will continue unless and until enjoined by this Court.

25. The defendants' acts have caused and will continue to cause irreparable injury to the plaintiff. The plaintiff has no adequate remedy at law and is thus damaged in an amount yet

to be determined.

26. The defendants' conduct is willful and intentional.

27. As a result of defendants' actions, the plaintiff has suffered substantial damages as hereinbefore alleged

COUNT II
USE OF COUNTERFEIT MARKS IN VIOLATION OF MASSACHUSETTS
(G.L. c. 110h § 12)

28. All allegations set forth above are restated and realleged as if set forth in full herein.

29. G.L. c. 110h § 12 provides that:

a person who shall

(i) use, without the consent of the registrant, any reproduction, counterfeit, copy, or colorable imitation of a mark ... in connection with the sale, distribution, offering for sale, or advertising of any goods or services on or in connection with which the use is likely to cause confusion or mistake or to deceive as to the source of origin of such goods or services; or

(ii) reproduce, counterfeit, copy or colorably imitate the mark and apply the reproduction, counterfeit, copy or colorable imitation to labels, signs, prints, packages, wrappers, receptacles, or advertisements intended to be used upon or in connection with the sale or other distribution in the commonwealth of such goods or services; shall be liable in a civil action by the registrant for the remedies provided in section 14.

30. Section § 14 provides that:

An owner of a mark registered under this chapter may proceed by suit to enjoin the manufacture, use, display or sale of any counterfeits or imitations thereof and the superior court may grant injunctions to restrain the manufacture, use, display or sale as may be considered by the court as just and reasonable, and may require the defendants to pay to the owner all profits derived from and all damages suffered by reason of the wrongful manufacture, use, display or sale... The court, in its discretion, may enter judgment for an amount not to exceed 3 times the profits and damages and reasonable attorneys' fees of the prevailing party in the cases where the court finds the other party committed wrongful acts with knowledge or in bad faith or otherwise as according to the circumstances of the case.

31. The defendants' used, without consent, the UIU name in connection with their

services.

32. This use has caused confusion and has diluted and/or is likely to dilute the distinctive quality of the UIU name and to lessen the capacity of this name to identify and distinguish the plaintiff's services.

33. The defendants' unlawful use of the UIU name is also likely to tarnish UIU's reputation and cause blurring in the minds of third-parties between UIU and the defendants, thereby lessening the value of the UIU's name as a unique identifier of the plaintiff's services.

34. By the acts described above, the defendants have caused a likelihood of harm to UIU's business reputation in violation of Massachusetts General Laws c. 110h § 12.

35. The defendants' acts have caused, and will continue to cause, irreparable injury to the plaintiff. The Plaintiff has no adequate remedy at law and is thus damaged in an amount not yet determined.

COUNT III
FRAUD

36. All allegations set forth above are restated and realleged as if set forth in full herein.

37. The defendants have engaged in fraud by, among other things, creating counterfeit UIU's organizations, using UIU's proprietary and legal information, including, presumably, its IRS tax identification information, without UIU's permission, and knowingly making fraudulent and deceptive representations to third parties for the purpose of inducing said parties into believing that the defendants represented UIU.

38. Said fraudulent and deceptive actions and representations were made by the defendants with the specific intent to defraud the plaintiff.

39. Said representations and statements were material and were relied upon by third parties inducing them to remit to the defendants monies which would have otherwise been remitted to the plaintiff.

40. As a result of the defendants' fraud, the plaintiff has suffered substantial losses and its continued existence is threatened, as hereinbefore alleged.

COUNT IV
UJUST ENRICHMENT

41. All allegations set forth above are restated and realleged as if set forth in full herein.

42. The defendants were unjustly enriched by falsely holding themselves out as representatives of UIU in order to fraudulently induce donors and business partners into remitting to them monies and services.

43. The defendants were unjustly enriched by the money collected from donors and other third parties, which should have been monies due UIU.

44. Continued retention of these payments would be unjust and inequitable under the circumstances.

45. The defendants should be liable to UIU for their unjust enrichment in an amount to be determined by the Court.

COUNT V
SLANDER OF TITLE

46. All allegations set forth above are restated and realleged as if set forth in full herein.

47. The defendants published numerous false statements to third parties regarding their continued authority to act as representatives of UIU.

48. These statement were untrue.

49. The defendants knew or should have known that these statement were untrue.

50. It was foreseeable that these representations would cause the plaintiff harm.

51. The plaintiff has been substantially harmed thereby, including without limitation by harm to UIU's reputation, and demands just compensation therefor.

COUNT VI
TORTIOUS INTERERENCE WITH CONTRACT

52. All allegations set forth above are restated and realleged as if set forth in full herein.

53. The plaintiff had relationships or contemplated contracts of benefit with prospective donors and business partners.

54. The defendants, by falsely representing that they had the authority to represent UIU, intentionally or recklessly interfered with those relationships and otherwise harmed the plaintiff's reputation, causing plaintiff to suffer damages as a result.

55. The plaintiff has been substantially harmed thereby, and demands just compensation therefor.

JURY CLAIM

Umuoji Improvement Association (North America), Inc. claims a trial by jury for all of the issues so triable.

WHEREFORE, THE PLAINTIFF, UMUOJI IMPROVEMENT UNION (NORTH AMERICA), INC., DEMANDS THAT THIS HONORABLE COURT:

1. Issue a short order of notice requiring the defendants to appear before this court at such time and place as the court may fix, to show cause, if any there be, why a preliminary injunction should not be issued;
2. After hearing upon such notices as the court may issue, enter a preliminary injunction enjoining the defendants from continuing to use UIU's name and to act

as agents of UIU, and ordering the defendants to file with the Court a complete and itemized accounting of all monies collected in UIU's name since September of 2017;

3. Order the defendants to account to the plaintiff for all sums of money, profits and gains which the defendants have earned for their own account since September 2017;
4. Order the defendants to pay to the plaintiff such damages as have been sustained in consequence of the defendants' violations of law or such damages as the court shall deem proper;
5. Award the plaintiff treble damages, attorney's fees and costs pursuant to G.L. c. 110h §§ 12 and 14; and
7. Order such further relief as may be equitable and just.

Respectfully submitted,

UMUOJI IMPROVEMENT UNION
(NORTH AMERICA), INC.,

Plaintiff,

By its attorney,

/s/ Travis T. Pregent
Travis T. Pregent (BBO: 682998)
PREGENT LAW
One State Street, 1200
Boston, MA 02109
(978) 381-3256
travis@pregentlaw.com

Dated: 12.16.20

CERTIFICATION

I certify that I have served this document via Notice of Electronic Filing for parties and counsel on the date set forth below in accordance with the Federal Rules of Civil Procedure and this Court's Local Rules.

/s/ Travis T. Pregent
Travis T. Pregent

Date: December 16, 2020

VERIFICATION

I, Peter Okeke, President of Umuoji Improvement Association (North America), Inc., hereby certify that I have read this Verified Complaint and the allegations of fact stated therein are true based on my personal knowledge and, where applicable, my review of the exhibits cited herein, except as to those allegations stated as being based upon information and belief, which I believe to be true based on the information available to me.

Signed under the penalties of perjury this 10th day of December, 2020.




Peter Okeke

Exhibit A

Nebraska Secretary of State

Corporate & Business Search

 New Search

 FAQs / Help ▼

UMUOJI IMPROVEMENT UNION (NORTH AMERICA), INC.

Mon Oct 26 09:12:00 2020

SOS Account Number
10126783

Status
Active

Principal Office Address
6821 SOUTH FORK CIRCLE
LINCOLN, NE 68516

Registered Agent and Office Address
MATTHIAS I. OKOYE, M.D.
6821 SOUTHFORK CIRCLE
LINCOLN, NE 68516

Nature of Business
ORGANIZATION FOR PUBLIC BENEFIT

Entity Type
Non Profit (Dom) Corp
Qualifying State: NE

Date Filed
Sep 01 2009

Corporation Position	Name	Address
President	PETER OKEKE	3808 SW BOULDER DRIVE LEES SUMMIT, MO 64082
Secretary	CHINEZE NKEMEH	16W 331 SOUT JACKSON STREET WILLOWBROOK, IL 60527
Treasurer	CLETUS EZEJI	8516 CEDAR HOLLOW LANE HUNTERSVILLE, NC 28078
Director	JOSEPH ACHEBE	820 BESSEMER DRIVE WYLIE, TX 75098
Director	CHIKA AGUANUNU	8234 SOUTH RICHMOND STREET CHICAGO, IL 60562
Director	EMMANUEL OFFODILE	4923 LAKE CATHERINE COURT RICHMOND, TX 77407
Director	PETER OKEKE	3808 SW BOULDER DRIVE LEES SUMMIT, MO 64082
Director	EMMANUEL OKOYE	123 AUDUBON AVE SUITE 1 JERSEY CITY, NJ 07305
Director	MATTHIAS I OKOYE	6821 SOUTHFORK CIRCLE LINCOLN, NE 68516
FINANCIAL SECRETARY	PEARL OGUCHI	3710 PELICAN LAKE DRIVE RICHMOND, TX 77406
Chairman	FRANCIS ONUKWULI	7544 SEDONA DRIVE JONESBORO, GA 30236
VICE CHAIR	FIDELIS ONYIMBA	8775 COUDLEAP COURT COLUMBIA, MD 21045

Exhibit B



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UIU-NA INCORPORATED

Victor Okoye,

By the virtue of the power and authority vested in the NEC of UIU NA, we constitutionally removed you from the office of the President, because of the following reasons.

Failing to call-in, to defend allegations leveled against you by members of the union, when there is an undeniable evidence that you were properly and adequately notified.

An exhibition of incompetence

Tampering with UIU NA finances.

Withdrawing \$9000 without authorized signatories.

Misrepresentation of UIU-NA

Creating of factions in the organisation by having CEC in the NEC and forming another organization called UMUOJI IN DIASPORA.

Admitted a group of Umuojians from Canada into the NEC as a certified branch when they are not. These brothers did nothing but disrespected and insulted members.

The foregoing allegations violate the Article 1X of our Constitution, which calls for disqualification and removal of an officer.

Consequently, the presiding member of NEC, Chief Peter Okeke, Ichie Obieze presented a motion to enter a default judgment against you, because you intentionally did not show up to defend yourself. The motion was seconded. And there were ten votes out of ten members of the NEC in favor, to impeach and remove you, Victor Okoye from the office the presidency. It was a unanimous decision to replace you immediately with our current Vice President Ikechukwu Oforje.

The NEC, hereby congratulates Mr Ik Ofoje, for being the new President of the union. At the same time, giving him twenty-four hours to address members of UIU NA.

Patrick Achebe, Publicity Secretary, UIU NA

11/18/18

Exhibit C



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A SPECIAL UIUNA NEC MEETING MINUTES OF NOVEMBER 18, 2018

National Executive Officers in attendance:

Patrick Achebe

PearlOguchi

Cletus Ezeji

Attendance By Branches:

Chicago Branch

Dallas Branch

Houston Branch

New York/New Jersey Branch

Kansas City Branch

The NEC meeting was called in to order by the national publicity secretary, Mr. Patrick Achebe at about 9:30 p.m. He suggested that the senior NEC member Peter Okeke chair the meeting. This was approved unanimously by all the members present. Mr. Peter Okeke called on Mrs. Pearl Oguchi to lead us in an opening prayer. Mrs. Oguchi said the opening prayers and the meeting commenced. Mr. Okeke the chairman inquired if Victor Okoye was present in the meeting. And there was no response from Victor Okoye. The chairman asked members if they had read any of the responses from Victor Okoye regarding the meeting. The house unanimously indicated that they read the notice about the meeting including Victor's response asking members not to attend the meeting. The



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1.

chairman asked members to construe Victor's message asking members not to attend as a concrete evidence of his receipt and acknowledgement of the meeting as scheduled. This was also unanimously agreed to. With this development, the chairman submitted a motion that the house find Victor Okoye guilty of all allegations against him by default since he deliberately chose not to appear to defend himself.

This motion was seconded by Mike Obadike. This was called into vote by national Publicity secretary Mr. Patrick Achebe. All members of NEC present voted unanimously to find Victor Okoye guilty of all allegations against him for not showing up to defend himself against all allegations against him. A second motion was also submitted by the chairman to impeach Victor Okoye effectively. This motion was unanimously voted on by all members present and Victor Okoye was effectively impeached and removed as our president. Another motion was submitted by the chairman and seconded by Mr. Osy Ezeji to write a letter to the Vice President Ike Ofoje asking him to assume the presidency of our organization and to address NEC members as well as general membership within 24 hours as our leadership could not be left vacant. This motion was also voted unanimously by all members present. And it was passed. The publicity secretary was directed to write a letter to Victor Okoye and the vice president giving them information on the outcome of our meeting. He was directed to ask the vice President to address NEC and the general membership as agreed to. Closing prayers was said by Mike Obadike and the meeting was adjourned.

A handwritten signature in black ink, appearing to read 'Patrick Achebe', written over a horizontal line.

Signed: Patrick Achebe 11/18/2018

Exhibit D



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November 20, 2018

**MINUTES OF UIUNA BOARD OF TRUSTEE/NATIONAL EXECUTIVE COUNCIL
MEETING HELD ON 11/20/18.**

IN ATTENDANCE: Dr. Victor Ide-Okoye, Ike Ofoje, Chinyelu OkekeEkpe, Chuma OkekeEkpe, Tony Mekkam, Ngozi Stella Nkulume, Ike Nkulume, Okwui Agbim, Anthonia Anyakora, Dr. Adaeze Muoghalu, Arinze Ikwuazor, Onyeka Chika, Pius Anyakora, Jude Ejiofor, Captain Henry Onwuachu, Amaka Ejiofor, Okey Chika, Uju Belonwu, Dr. Jacob Mgbemena, Chinwe Chio Mgbemena. Ifeanyi Odaba; Arinze Anyakora; Andy Okekekpe; Fidelis Sunday Mekkam; Joe Uyalue.

Opening prayers was said by Mrs. Chinyelu Okeke Ekpe.

The meeting's agenda was to discuss:

1. Defamatory article against Our National President by those opposing our Medical Center Project, to deliberate and make decisions regarding the defamatory messages that are going around in various group emails and WhatsApp forums by Patrick Achebe, Peter Okeke, Osy Ezeji and Anthony Enweze, and Onyebuchi Metu, purporting that they impeached our National President
2. UIUNA Inc. Domestication/Conversion/Registration to a New Domicile (Massachusetts) Since we have no branch or any presence in Nebraska. To maintain our EIN number and report to the IRS on the organization's Form 990.
3. Legal Action to protect our money; funds raised during our just concluded 2018 UIUNA Annual National Convention in New Jersey, Legal Action Against the Treasurer.

President Remarks:

The president stated that he saw the defamatory write-up and he plans to take a legal action against the individuals involved. He stated that he originally treated this information as garbage news being disseminated by uninformed individuals or by disgruntled opposition members. The president stated that he received numerous calls from all over the country especially those in Massachusetts wondering what was going on. Most of the callers advised the president to further investigate this matter because it has the propensity to undermine the trust and goodwill, he currently enjoys among Umuojians who are looking forward to the completion of the Medical Center.



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The President indicated that he wants the Board to weigh in and decide the way forward on the Agenda at hand.

Members universally condemned this illegal move by the few elements who are opposing the Medical Center Project. Members individually expressed outrage at the audacity of the opposition to embark on this dangerous path. It was pointed out that constitutionally only the President or someone delegated by the president has the power to call or schedule meetings. The only people empower to elect or remove the President is the General House during our National Annual Convention. What these three guys did was simply to defame our National President

Members then deliberated on how best to respond to those opposing our Medical Center Project. Suggestions ranged from totally ignoring the nonsensical write-up as championed by Chuma OkekeEkpe, Ike Nkulume and Chinwe Mgbemena, or to suspend those involved.

Finally, the consensus was to suspend those responsible for the defamatory writeup namely; Patrick Achebe, Peter Okeke, and Osy Cletus Ezeji, and also, to publish a disclaimer letter.

Another resolution reached was Domestication/Conversion/Registration of our organization to a New Domicile (Massachusetts) and closed the article incorporation in Nebraska.

The members encouraged the National President to take all the necessary legal actions against those who are defaming his good name.

We also resolved to take all the necessary legal actions to secure our money with the Bank of America, and take a legal action against the Treasurer. It should be pointed out that Captain Henry Onwuachu has been a vocal leader on this matter. We agreed that the lawsuit should be filed in Texas where the Treasurer lives.

Meeting was then adjourned and closing prayers said by Mrs. Chinyelu Okeke Ekpe, Atlanta Branch Chairperson. Meeting adjourned at 11.02 PM.

Minutes written by IKE NKULUME



UIU NORTH AMERICA, INC.

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November 25, 2018

UMUOJI IMPROVEMENT UNION NORTH AMERICA INC. COMMUNIQUE FROM OUR TELECONFERENCE MEETING OF November 25, 2018;

By the National Executive Committee Members and stakeholders OF UIU/NA

Fellow Umuojians, we wish to express our disgust and outrage at the rabid publication by a group of people who called themselves members of National Executive Committee (NEC) namely, Peter Okeke and Patrick Achebe who claimed that they purportedly called a special session meeting to remove our duly elected National President, Dr. Victor Ide-Okoye. This action is beyond comprehension, irrepressible, condemnable and should be totally disregarded. There was no such meeting and such their purported letter of impeachment from the angle of illegality should therefore be condemned in totality, regarded as a NULLITY, and be cast into the abyss for good. We have also counseled our impeccable National President to sue those who published the said publication for defamation of character.

We want to inform the public that no such publication emanated from the UIU/NA NEC and urge you to totally disregard the said publication for not only lacking in legitimacy but also grossly misleading and perhaps intended to cause disaffection and disharmony among the loving and progressive people of Umuoji residing in USA-NA. From the background, the individual, Peter Okeke has been known for his belligerent attitude dating back to the administration of Dr. Austin Obiaku which caused him the election of 2013 at Chicago during our National Convention and ever since, has continued to cause disaffection among members of UIU NA. What was worse, Mr Peter Okeke and his soldiers of disunity do not represent UIU/NA members and he and his cohorts are vested with zero constitutional powers to call any UIU/NA OR UIU/NEC meetings! Indeed there has been no discussions whatsoever on the topic of removing or electing any National President for UIU/NA. As stipulated in our Constitution the election of our officers is done every two years during our National Convention and the only authorized body to do that is the members of UIU/ NA during convention. As far as we concerned Peter Okeke is a damaged good and will never be part of anything good for our UIU/NA.

Our Constitution, both the approved and amended one pending ratification is very clear in this respect and provides as follows:

SECTION 5 7.5 Executive Meeting; the only authorized person to call the meeting; 7.5.2; The President shall call for all executive meetings.

7.6.1 Emergency meeting shall be called by the President (or any executive designated by the President) to discuss special needs facing the Union.

We live here in the United States, a country of laws and some people are still behaving childishly simply because they are blinded by hate for one person.

Also, Mr. Osy Ezeji, for the period of time since he was elected the Financial Secretary of UIU/NA, has never ever rendered any monthly or annual financial reports as required for non-profits organizations such as UIU/NA. Our Financial Report for Atlanta 2016 National Convention was supposed to be rendered in Maryland 2017 during our Annual Convention, it was never done. Again, during our 2018 New York/New Jersey Convention, he supposed to render Maryland 2017 convention financial report, and he never did. Coming up with crazy excuses, and he thinks we are fools.

And that was the reason our National President took some action, and mandated the 2018 National Convention Committee Team headed by Mrs. Ngozi Nkulume and Chief Mike Obadike, the branch President, to make sure that all our funds were collected and deposited to the bank immediately after the convention and render our account accordingly. What is even more worrisome about our Financial Secretary has been noted for meddling with the finances of the Union without explanation to the extent of non financial rendition putting our union into great jeopardy.

Before Dr. Ide-Okoye was elected OUR National President, most of us, no longer want to contribute any money because we no longer trust the way our funds are handled. The 2017 Maryland Convention which was last convention before Ide-Okoye was elected, we spent \$17,000 in that convention, but our financial secretary could only account for only about \$14,000. We lost \$3,000 and made no profit. We are not stupid; nobody wants to donate anymore any longer. The only reason some of us are contributing now is that we trust this current leadership. They are doing what they promised they would do and we can see it with our naked eyes.

Mr. Ezeji who has a penchant for writing and accusing our President of illegality, has a history of not making cash deposits after conventions into the account of the union until several weeks after the event and members hardly receive receipts for donations they made from the financial secretary. Upon assumption of office by the current administration, this flawed financial practices were no longer going to be condoned and as the president began clamoring for these changes to be made by the financial Secretary, Mr. Osy Ezeji, who is no longer allowed to conduct business as usual, has since declared war on the President, smear campaign and all. He has called so many of us to tell us rubbish about our President but some of us no longer pick his calls. In past administrations, the financial blunder and risk of allowing the Financial Sec. as a signatory to the account against the provisions of the Union's operating constitution was no longer going to work under this administration given the risk inherent in practices such as these for instance during previous's administration, the blunder of allowing Mr. Osy Ezeji to become a signatory to the account led to him abusing that privilege by not allowing things done in record time even after the approval of the governing body-NEC. For instance, the Security Funds due to Umuoji in early 2016 after NEC had approved the release for the security trust fund was unilaterally stalled by Mr. Ezeji who refused to carry out the order of the NEC, withholding monies already approved by NEC for Umuoji security fund for over a year. In past administrations, Mr. Osy Ezeji made

transfers on behalf of the Union with checks written in his personal name; exchange rate at outrageously low amounts, thereby causing the union to spend more money. We are still waiting and we must get to the bottom of it. All the transfers Osy was making, has he ever gone to the bank with any officer to do them.

The litany of Mr. Ezeji's financial transgression against the union and the current administration's bid to put a stop to it is why these charlatans are losing their minds.

During our 2018 National Convention in New Jersey under the able and dynamic leadership of our National President, we debated for 4.5 hours about the medical Center Project. Our NATIONAL President made a power presentation about the medical center project and questions were asked and answered.

We debated passionately about the project; the oppositions were fierce and nasty. Some people wanted us to go and rebuild the Abor Maternity Home and most of us wanted to build a modern Medical Center in Umuoji. After deliberating for over 4 hours, the votes were called and the votes was 49 Yeses and 0 No's to build a new medical center. Those fiercely against this project were acutely aware they were losing big time and decided not to vote against it because they didn't want the record to reflect their opposing to a lifesaving project for our brothers and sisters back home. Today, they are openly and brazenly showcasing their disgust at the project making these all efforts to see to its stalemate. But God Forbid! We are out to stand on the mandate from the 2018 National Convention was to form the Building Committee and start the project and that was exactly what this Executive did.

Our President is working well with all his key officers, our National Secretary and Our Vice National President and that speaks volume.

Our able National president had travelled to Nigeria on behalf of UIU/NA with his own money three times since he became UIU/NA National President; and he singlehandedly fought for and secured the land where we are currently erecting this Medical Center. To the best of our recollections, the last president before Dr Ide Okoye was reimbursed for his official trips to Nigeria.

We are repulsed that these are people alleging that National President did something illegal. We are not sure why they repeatedly allege that our National President did something wrong except simply because they are driven by hate and do not want to accept that a project of this scale can be accomplished in less than two years.

For the umpteenth time, the National Executive Community (NEC) approved \$10,000 to be sent to Nigeria to enable the Building Committee to start the Medical Center project. When the Treasurer refused to do what she was mandated to do by the NEC which was to disburse the funds, Some members of the NEC asked the National President to compel the Treasurer to carry out the delegated action of the NEC. After it was obvious that the Treasurer wasn't willing or able to carry out the task assigned to her, the National President carried out the mandate of NEC. The so-called \$9,000.00 was transferred by our President to the contractor and was the initial amount invested in our medical project and began the foundation for our medical center.

The account transfer has been published on numerous occasions for all to see! This \$9,000.00 was approved by the National Executive Committee (NEC). If we should ask- when you contract a job out to a builder and you want to send the money to the contractor, do you send money to the contractor through a third party?. What is the fuse about sending money to the contractor duly selected by a team of seasoned personalities of Umuoji entrusted with the role?.

The ironical part of this story was that these men chose to ignore the transgressions and outright illegalities of the financial secretary and the treasurer who unilaterally took the remaining funds belonging to UIU/NA in the fund of \$50,000.00 and refuses till date to add the president and the secretary as signatories to the account that she opened going against the clear mandates of NEC who had asked her to add the President and Secretary to that account.

These characters who are blinded by hate and jealousy, continue to malign and defame the president who is working in the interest of UIU NA. We sincerely recognize the right of criticism but only frown could frown at unguarded and unfounded and defamatory criticism driven by hate, jealousy and unpatriotic.

Let the truth be told, over the last couple of years, from about 2009, we have invested over \$50,000.00 in the renovations of Community Secondary School Umuoji, but nothing to show for it. We urge all to go to that school and see if you think such amount was actually spent there. That is all we have to say about that.

We implore all to go and see what the current administration under the audacious leadership of our current President has done in less than few months. He is being persecuted and his name being maligned by those who thought that they are UIU/NA egg-heads, but under whose noses the financial secretary has muzzled the finances of the union and nobody asked questions. This is a guy who has donated some six thousand dollars (\$6,000) with his wife to this project since its inception! None of these so called characters telling us that they have impeached our President has donated any money toward this project. They do not mean well for our union or care for the well being of our brothers and sisters back home. Yet, they want you to believe that they are fighting to safeguard the money that we have donated for this project. The funny thing is that none of these characters writing have contributed any money towards this project and they will try to tell you that they are not opposing the project.

We are formally putting them on notice that if they dare tamper with our money we will act accordingly.

We all live in different states here in the US, and it is only one officer that does the transfer once the approval is made. We have transferred thousands of dollars to Nigeria to all the projects we have done in Nigeria. Never has there been two signatories going to the bank to effect the transfer. We are not talking of check writing here, so don't let them confuse you. What exactly are they trying to say? That the President has only one signatory? It is obvious that these guys have one clear motive; to derail this project and they would never ever get their wish.

Our President is doing an excellent job for us and if those calling for his impeachment, who for whatever reason do not want him; should feel free to elect their president and start their own association. We love our president leadership and we are riding the wave of progressive and positive leadership with him.

We have a Building Committee who oversees this Medical Center Project, and these people choose to discount the incredible work these selfless sons and daughters of Umuoji are doing, choosing instead to persecute our President, as if the President is the one that does everything

In conclusion, we have empowered our elected President and his executive to continue the good job they are doing for our union. Our National Vice President Ike Ofoje, is not part of your nonsense and you should not get him involved with your illegality. Our President should be praised and not vilified, we stand with this president and we love and appreciate him for what he is doing for our people. We will continue to contribute money towards our medical center project until the project is completed because we trust our National President leadership. We pray that all the enemies of Umuoji will fail.

Signed:

1. Tony Mekkam;; 2. Dr. Adaeze Muoghalu;; 3. Chuma A. Okekekpe ; 4. Onyeka Chika;
5. Capt. Henry Onwuachu; 6. Anthonia Anyakora; 7. Ifeanyi Odaba; 8. Arinze Ikwuazor;
9. Ike Nklume; 10. Dr. Jacob Mgbemena; 11. Chinwe Chio Mgbemena; 12. Chuma Okekekpe;
13. Chief Jude Ejiofor; 14. Ike Ofoje; 15. Amaka Ejiofor; 16. Chinyere Okekekpe;
17. Engr. Pius Anyakora; 18. Okey Chika; 19. Arinze Anyakora; 20. Andy Okekekpe;
21. Anthonia Nwachukwu; 22. Fidelis Sunday Mekkam; 23. Joe Uyalue;; 23. Stella Ngozi Nkulume 24. Uju Belonwu, 25. Ike Okeke.

Exhibit E



William Francis Galvin
Secretary of the Commonwealth of Massachusetts


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Corporations Division

Business Entity Summary

ID Number: 001369299

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Summary for: UMUOJI IMPROVEMENT UNION (NORTH AMERICA), INC.

The exact name of the Nonprofit Corporation: UMUOJI IMPROVEMENT UNION (NORTH AMERICA), INC.

Entity type: Nonprofit Corporation

Identification Number: 001369299

Date of Organization in Massachusetts: 02-28-2019

Last date certain:
Current Fiscal Month/Day: 12/31

The location of the Principal Office in Massachusetts:
Address: 20 CENTRAL AVENUE SUIT 512,

City or town, State, Zip code, Country: LYNN, MA 01901 USA

The name and address of the Resident Agent:
Name: DR. VICTOR OKOYE

Address: 20 CENTRAL AVENUE SUIT 512,

City or town, State, Zip code, Country: LYNN, MA 01901 USA

The Officers and Directors of the Corporation:

Title	Individual Name	Address	Term expires
PRESIDENT	VICTOR IDE OKOYE	21 ORCHARD AVENUE SAUGUS, MA 01906 USA	12-31-2021
TREASURER	ANTHONY CHUMA OKEKE	2660 BUENA VISTA RD COLUMBUS, GA 31906 USA	12-31-2021
CLERK	IKE NKULUME	2132 COURT UNION, NJ 07083 USA	12-30-2021
DIRECTOR	ADAEZE MUOGHALU	1504 WILDFLOWER LANE FLOWER MOUND, TX 75028 USA	12-30-2021
DIRECTOR	JACOB MGBEMENA	2068 MURRY TRAIL MARROW, GA 30260 USA	12-31-2021

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Exhibit F



William Francis Galvin
Secretary of the Commonwealth of Massachusetts



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Corporations Division

Business Entity Summary

ID Number: 001292920

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Summary for: UMUOJI IMPROVEMENT UNION, MASSACHUSETTS, INC.

The exact name of the Domestic Profit Corporation: UMUOJI IMPROVEMENT UNION, MASSACHUSETTS, INC.

Converted into **UMUOJI IMPROVEMENT UNION, MASSACHUSETTS, INC.** on 02-08-2019

Entity type: Domestic Profit Corporation

Identification Number: 001292920

Old ID Number:

Date of Organization in Massachusetts: 09-28-2017

Date of Conversion: 02-08-2019

Last date certain:

Current Fiscal Month/Day: 1 /31

The location of the Principal Office:

Address: 125 WHIPPLE STREET, #23

City or town, State, Zip code, Country: WORCESTER, MA 01610 USA

The name and address of the Registered Agent:

Name: JUDE EJIOFOR

Address: 125 WHIPPLE STREET, #23

City or town, State, Zip code, Country: WORCESTER, MA 01610 USA

The Officers and Directors of the Corporation:

Title	Individual Name	Address
PRESIDENT	JUDE EJIOFOR	125 WHIPPLE STREET, #23 WORCESTER, MA 01610 USA
TREASURER	OLIVE CHUKWUANU	1100 GOVERNORS DRIVE WINTHROP, MA 02152 USA
SECRETARY	OKWUI AGBIM-SUMANI	52 TIFFANY DRIVE RANDOLPH, MA 02368 USA
VICE PRESIDENT	INNOCENT ONYIMBA	26 CHANNING STREET WORCESTER, MA 01610 USA
ATTORNEY IN FACT	OGOR OKOYE	21 ORCHARD AVE SAUGUS, 01906 US
DIRECTOR	OKEY CHIKA	185 GREEN STREET, #67 JAMAICAN PLAIN, MA 02130 USA
DIRECTOR	VICTOR IDE-OKOYE	21 ORCHARD AVENUE SAUGUS, MA 01906 USA

Business entity stock is publicly traded: ☐

The total number of shares and the par value, if any, of each class of stock which this business entity is authorized to issue:

Class of Stock	Par value per share	Total Authorized		Total Issued and outstanding
		No. of shares	Total par value	No. of shares
CWP	\$ 0.00	100	\$ 0.00	100

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